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*Attorneys for Plaintiff*  
GONG.IO, INC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

GONG.IO, INC.,  
  
Plaintiff,  
  
v.  
  
HYPERDOC INC. d/b/a RECALL.AI,  
  
Defendant.

Case No. 5:25-cv-1026-NW

**JOINT STATEMENT REGARDING  
HEARING ON MOTION TO DISMISS  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT PURSUANT TO THE  
COURT'S POLICY OF  
ENCOURAGING OPPORTUNITIES  
FOR JUNIOR LAWYERS**

Judge: Hon. Noël Wise

1 Defendant Hyperdoc Inc. d/b/a Recall.ai (“Recall”) and Plaintiff Gong.io (“Gong”) hereby  
2 submit this joint statement regarding the hearing on Recall’s Motion to Dismiss the First  
3 Amended Complaint (“Motion”), which the Court has set for October 1, 2025.

4 In view of the Court’s Standing Order welcoming and encouraging oral argument by less-  
5 experienced attorneys,<sup>1</sup> the parties respectfully request that the Court consider holding oral  
6 argument on this Motion. Should the Court grant oral argument, counsel intends to have Joyce  
7 Li, an associate attorney with 7 years of experience, present argument on behalf of Recall, and  
8 Samantha Leff, an associate attorney with 3 years of experience and who has not previously  
9 argued in Federal Court, present argument on behalf of Gong.

10 Counsel also agree to mutually waive the “one attorney” rule and respectfully request that  
11 a more experienced attorney be allowed to assist the less experienced attorney during the  
12 argument, if needed to protect their respective client interests—which greatly assists counsel in  
13 persuading their clients to allow oral argument opportunities for less experienced attorneys.

14  
15 Dated: September 26, 2025

MORRISON & FOERSTER LLP

16  
17 By: /s/ Timothy Chen Saulsbury  
18 Timothy Chen Saulsbury

19 *Attorneys for Defendant*  
20 HYPERDOC INC. d/b/a RECALL.AI  
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27 <sup>1</sup> Standing Order for All Civil Cases Before District Judge Noël Wise, Section N (available at  
28 [https://cand.uscourts.gov/wp-content/uploads/judges/wise-nw/NW-CivilStandingOrder\\_05-06-25.pdf](https://cand.uscourts.gov/wp-content/uploads/judges/wise-nw/NW-CivilStandingOrder_05-06-25.pdf)).

1 Dated: September 26, 2025

ORRICK, HERRINGTON & SUTCLIFF LLP

2  
3 By: /s/ Clement S. Roberts

4 Clement S. Roberts

5 *Attorneys for Plaintiff*  
6 GONG.IO, INC.  
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**Attestation Re Electronic Signatures**

I, Timothy Saulsbury, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 26, 2025

By: /s/ Timothy C. Saulsbury  
Timothy C. Saulsbury